

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

NICOLE PAYNE

§

VS.

§

CIVIL ACTION NO. 4:12-CV-432-Y

PROGRESSIVE FINANCIAL SERVICES,
INC.

§
§
§

MOTION TO WITHDRAW AS CO-COUNSEL

In response to this Court's October 12, 2012, Order Requiring Compliance (doc. 19), Marshall S. Meyers respectfully requests an order on leave to withdraw as co-counsel for Plaintiff Nicole Payne.¹ Alongside her local counsel of record, James R. Claunch and Kirk M. Claunch, Ms. Payne's lead counsel of record, Noah D. Radbil, will continue to represent her in the above-styled and numbered cause. Ms. Payne no longer requires Mr. Meyers to remain on the docket and, therefore, Mr. Meyers respectfully requests permission to withdraw.

¹Mr. Meyers's Application for Admission Pro Hac Vice (doc. 11) was unfiled because it contained a certificate of good standing from a United States District Court instead of an original certificate of good standing issued within the past 90 days from the attorney licensing authority in a state in which Mr. Meyers is admitted to practice (see docs. 12, 19). Out of an abundance of caution, Ms. Payne respectfully attaches a current certificate of good standing from the Clerk of the Supreme Court of Arizona.

Dated: October 19, 2012.

Respectfully submitted,

By: /s/ Noah D. Radbil
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Counsel of Record for Plaintiff NICOLE PAYNE

CERTIFICATE OF SERVICE

On October 19, 2012, I filed the foregoing document with the clerk of the U.S. District Court, Northern District of Texas, Fort Worth Division, using the Court's EM/ECF system. Delivery of the notice of electronic filing that is automatically generated by ECF constitutes service under Fed. R. Civ. P. 5(b)(2)(E) on Defendant Progressive Financial Services, Inc.'s attorney of record, who is a registered user of ECF.

By: s/Noah D. Radbil
Noah D. Radbil

CERTIFICATE OF CONFERENCE

This motion is unopposed. On October 19, 2012, counsel for Progressive Financial Services, Inc., confirmed this fact in writing.

By: s/Noah D. Radbil
Noah D. Radbil